

## **ATTACHMENT 18**

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	EB Docket No. 03-85
	)	
Business Options, Inc.	)	File No. EB-02-TC-151
	)	NAL/Acct. No. 30033217002
Order to Show Cause and	)	FRN: 0007179054
Notice of Opportunity for Hearing	)	

To: The Enforcement Bureau

**BUSINESS OPTIONS, INC.'S ANSWERS TO THE**  
**ENFORCEMENT BUREAU'S FIRST INTERROGATORIES**

Business Options, Inc. ("BOI"), pursuant to Section 1.323(b) of the Federal Communications Commission's ("Commission's") rules, 47 C.F.R. § 1.323(b), answers the Enforcement Bureau's First Interrogatories as follows:

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### **Interrogatory Number 1**

*Identify all employees or agents of BOI who communicated with consumers Barbara Beeson, Paul Brackett, Norman Crowley, Ida Guptill, Bessie Goodbrake, Lorie (or Laurie) Hart, Fred and Caroline Michaelis, or Beatrice Violette for the purposes of soliciting, confirming, and/or verifying these consumers' switch to BOI long distance service or their intent to cancel BOI long distance service.*

#### **Response to Interrogatory Number 1**

BOI objects to this interrogatory to the extent that it is argumentative, assumes facts that are in controversy, and purports to call for legal conclusions.

A list of employees or agents of BOI who communicated with the consumers at issue for the purposes of soliciting, confirming, and/or verifying the consumers' switch to BOI long distance service follows the consumers' names below:

- a) Barbara Beeson: Amanda Bernard, Tim Krause, and Franchesca Parker
- b) Paul Brackett: Robin Doe, Carol Mose, and, John McKee
- c) Normal Crowley: Melissa Grissom and Barabra Ballogg
- d) Ida Guptill: Elena Magana, Antoinette White
- e) Bessie Goodbrake: Tiffany Simms, Lekeisha Montgomery, and Teris Rice
- f) Lorie Hart: Melissa Grissom, Antoinette White, and Michael Tothfalusi
- g) Fred and Caroline Michaelis: Jason Rodmel, Antoinette White
- h) Beatrice Violette: Elena Magna, Aiada Izzario, Franchesca Parker

**Interrogatory Number 3**

*Identify all employees or agents of BOI who wrote, reviewed, edited, and/or approved BOI's letters dated December 9, 2002 and December 26, 2002, which responded to the November 1, 2002, letter of inquiry signed by Colleen K. Heitcamp, Chief, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission.*

**Response to Interrogatory Number 3**

BOI does not have a record of a December 26, 2002 letter responding to the November 1, 2002, letter of inquiry signed by Colleen K. Heitcamp, Chief, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission.

The employees or agents of BOI who wrote, reviewed, edited, and/or approved of the letter dated December 9, 2002, responding to the November 1, 2002, letter of inquiry signed by Colleen K. Heitcamp, Chief, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission are as follows: Ms. Shannon Dennie wrote the responses to Questions 1 through 6. Mr. Gene Chill wrote the responses to Questions 7, 8, 9, and 11. Ms. Dennie also reviewed and approved of Mr. Chill's responses to Questions 7, 8, 9, and 11. Mr. Kurtis Kintzel read Ms. Dennie's responses to questions 1 through 6, but did not conduct a meaningful review of them.

**Interrogatory Number 4**

*Identify all employees or agents of BOI who wrote, reviewed, edited, and/or approved BOI's Section 63.71 Application received by the Federal Communications Commission on December 27, 2002.*

**Response to Interrogatory Number 4**

The employee of BOI who wrote, reviewed, edited, and/or approved BOI's Section 63.71 application received by the Federal Communications Commission on December 27, 2002, is Ms. Lisa Green. Ms. Shannon Dennie reviewed and approved of the application.

BOI's Section 63.71 discontinuance application was modeled after, and is substantially similar to, the application of Cable & Wireless USA, Inc. to discontinue service under Section 63.71 of the Commission's rules, which was forwarded by fax to Ms. Lisa Green by Mr. Jon Minkoff of the Commission's staff on December 19, 2002, to serve as a template document.

On December 20, 2002, Ms. Lisa Green transmitted by fax a copy of BOI's Section 63.71 discontinuance application to Mr. John Adams of the Commission's staff, with a note stating "Please let me know if I am missing anyone or anything. Thank you! You have been a lot of help! Have a great holiday! Lisa."

**Interrogatory Number 5**

*Identify all employees or agents of BOI who wrote, reviewed, edited, and/or approved all of BOI's slamming complaint reports filed with the Federal Communications Commission since January 1, 1998, as required by 47 C.F.R. § 64.1180.*

**Response to Interrogatory Number 5**

BOI has not filed a slamming complaint report with the Commission under 47 C.F.R. § 64.1180 since January 1, 1998

**Interrogatory Number 6**

*Identify all employees or agents of BOI who wrote, reviewed, edited, and/or approved all of BOI's registration reports filed with the Federal Communications Commission since January 1, 1998, as required by 47 C.F.R. § 64.1195.*

**Response to Interrogatory Number 6**

BOI has not filed a registration report with the Commission under 47 C.F.R. § 64.1195 since January 1, 1998.

**Interrogatory Number 7**

*Identify all employees or agents of BOI who wrote, reviewed, edited, and/or approved the "Final Stipulation for Resolution of All Outstanding Matters" signed September 12, 2002, by William Brzycki on behalf of BOI, and signed September 18, 2002, by Sarah Hoffman, Special Counsel of the Department of Public Service (of the State of Vermont) in Docket No. 6729.*

**Response to Interrogatory Number 7**

William Brzycki was the employee of BOI who reviewed and edited, and Kurtis Kintzel the employee who approved, the "Final Stipulation for Resolution of All Outstanding Matters" signed September 12, 2002, by William Brzycki on behalf of BOI, and signed September 18, 2002, by Sarah Hoffman, Special Counsel of the Department of Public Service (of the State of Vermont) in Docket No. 6729.

**Interrogatory Number 8**

*Identify all employees or agents of BOI who communicated with Qwest Communications relating to change requests to switch the telephone service of Barbara Beeson, Paul Brackett, Norman Crowley, Ida Guptill, Bessie Goodbrake, Lorie (or Laurie) Hart, Fred and Caroline Michaelis, or Beatrice Violette.*

**Response to Interrogatory Number 8**

All change requests are submitted to Qwest electronically, thus there is no direct communication between Qwest and BOI. Shalonda Robinson is BOI's "Delivery Manager." Ms. Robinson manages the BOI division that handles customer change data entry, and transmits such information to Qwest electronically.

Respectfully submitted,



Mr. Kurtis Kintzel  
President, Business Options, Inc.  
1443 E. 84th Place  
Merrillville, IN 46410  
(219) 791-9110 (phone)  
(219) 791-9197 (fax)

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	EB Docket No. 03-85
	)	
Business Options, Inc.	)	File No. EB-02-TC-151
	)	NAL/Acct. No. 30033217002
Order to Show Cause and	)	FRN: 0007179054
Notice of Opportunity for Hearing	)	
	)	
To: The Enforcement Bureau	)	
<hr/>	)	

**AFFIDAVIT**

I, Kurtis Kintzel, President of Business Options, Inc., have read the foregoing document entitled "Business Options, Inc.'s Answers to the Enforcement Bureau's First Interrogatories," and hereby affirm that Business Options, Inc.'s Answers to the Enforcement Bureau's First Interrogatories are true and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Mr. Kurtis Kintzel  
President, Business Options, Inc.

June 12, 2003



Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	EB Docket No. 03-85
	)	
Business Options, Inc.	)	File No. EB-02-TC-151
	)	NAL/Acct. No. 30033217002
Order to Show Cause and	)	FRN: 0007179054
Notice of Opportunity for Hearing	)	

To: The Enforcement Bureau

**BUSINESS OPTIONS, INC.'S OBJECTIONS TO THE  
ENFORCEMENT BUREAU'S FIRST INTERROGATORIES**

Business Options, Inc. ("BOI"), by its counsel, and pursuant to Section 1.323(b) of the Federal Communications Commission's ("Commission's") rules, 47 C.F.R. § 1.323(b), hereby objects to the Enforcement Bureau's First Interrogatories as follows:

**Interrogatory Number 1**

*Identify all employees or agents of BOI who communicated with consumers Barbara Beeson, Paul Brackett, Norman Crowley, Ida Guphill, Bessie Goodbrake, Lorie (or Laurie) Hart, Fred and Caroline Michaelis, or Beatrice Violette for the purposes of soliciting, confirming, and/or verifying these consumers' switch to BOI long distance service or their intent to cancel BOI long distance service.*

**Response to Interrogatory Number 1**

BOI objects to this interrogatory to the extent that it is argumentative, assumes facts that are in controversy, and purports to call for legal conclusions.

A list of employees or agents of BOI who communicated with the consumers at issue for the purposes of soliciting, confirming, and/or verifying the consumers' is set forth in the Answers of Mr. Kurtis Kintzel to the Enforcement Bureau's First Interrogatories, filed concurrently.

**Interrogatory Number 2**

*Identify all employees or agents of BOI responsible for the management or oversight of each "appropriately qualified independent third party," as that term is used in 47 C.F.R. § 64.1120(c)(3), that BOI used to verify a consumer's request to change long distance service.*

**Response to Interrogatory Number 2**

BOI objects to this interrogatory on the grounds that it is argumentative, assumes facts that are in controversy, and purports to call for legal conclusions.

Respectfully submitted,



Kemal Hawa

Chadbourne & Parke LLP  
1200 New Hampshire Ave, NW  
Suite 300  
Washington, DC 20036  
(202) 974-5600 (phone)  
(202) 974-5602 (fax)

Counsel for Business Options, Inc.

June 13, 2003

**CERTIFICATE OF SERVICE**

I, Kimberly Kendrick, hereby certify that true and correct copies of the foregoing documents, entitled "Business Options, Inc.'s Answers to the Enforcement Bureau's First Interrogatories" and "Business Options, Inc.'s Objections to the Enforcement Bureau's First Interrogatories" were sent by courier and first class mail to the following individuals on this 13th day of June, 2003.

  
Kimberly Kendrick

Copies to:

Hon. Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th Street, S.W. Room 1-C864  
Washington, D.C. 20054

Trent Harkrader, Esq.  
Attorney, Enforcement Bureau  
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## **ATTACHMENT 19**

Marie T. Breslin  
Director  
Federal Regulatory



Verizon  
1300 I Street NW, Suite 400W  
Washington, DC 20005  
Phone 202 515-2533  
Fax 202 336-7922  
marie.t.breslin@verizon.com

December 9, 2002

**Via Email and Hand Delivery**

Mr. Peter G. Wolfe - Senior Attorney  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
Room 3-A101  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Request for Information

Dear Mr. Wolfe:

Attached are Verizon responses to your two November 20, 2002 requests for information. Also attached is the faxed copy of the declaration of Chris Creager, Senior Vice President Customer Operations. I will forward the original signed document as soon as I receive it in the mail.

Please call me if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Marie Breslin".

Attachments

For each of these customers listed on Attachment A, Verizon New Jersey received and executed carrier change orders during the time period specified, as follows:

Harry Brand, 732-833-0529

Verizon received electronic carrier change orders on 3-25-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date.

Verizon received electronic carrier change orders on 4-01-02 from AT&T for interLATA toll service. This carrier change order was executed on that date.

Customer complained that the intraLATA toll service change had not been authorized, and Verizon changed carrier back on 4-20-02.

After the first of these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of ILD Teleservices Inc.

4-14-02	\$102.31
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5-14-02	\$68.31
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The customer received credits of \$89.06 on the 5-14 bill and \$80.25 on the 6-14 bill.

Verizon also credited the customer for all carrier change charges billed

For the following customer listed on Attachment A, Verizon New Jersey did not receive or execute a carrier change order during the time period specified, however, it did receive and execute carrier change orders as follows:

Jacquelin Cocozza, 973-328-0429

Verizon received electronic carrier change orders on 3-13-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 4-10-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of ILD Teleservices Inc.

4-4-02	\$86.49
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5-4-02	\$70.38
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These charges were adjusted by the carrier.

Verizon also credited the customer for all carrier change charges billed.

For each of these customers listed on Attachment A, Verizon New England received and executed carrier change orders during the time period specified, as follows:

Helen Furriel, 401-683-3638

Verizon received electronic carrier change orders on 5-18-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 6-29-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of ILD Teleservices Inc. for ADST Inc.

6-20-02	\$31.89
7-20-02	20.44

All toll charges were recoured to the carrier.

Verizon also credited the customer for all carrier change charges billed.

Andree Mouawad, 401-727-8539

Verizon received electronic carrier change orders on 6-01-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed intraLATA toll carrier back on 6-21-02 and interLATA toll carrier back to None on 8-02-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of ILD Teleservices Inc. for ADST Inc.

6-14-02	\$16.16
7-14-02	53.33
8-14-02	.94
9-14-02	5.92

All toll charges were recoured to the carrier.

Verizon also credited the customer for all carrier change charges billed.

For each of these customers listed on Attachment A, Verizon New England received and executed carrier change orders during the time period specified, as follows:

Thelma Barrows, 207-725-2677 (note number change)

Verizon received electronic carrier change orders on 7-1-02 & 7-9-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on those dates. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 7-02-02 and 7-23-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

8-15-02      \$14.61

All toll charges were recoured to the carrier.

Verizon also credited the customer for all carrier change charges billed.

Paul and Ruth Brackett, 207-474-2170

Verizon received electronic carrier change orders on 5-22-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 6-17-02

Verizon did not bill the customer for any interLATA or intraLATA toll services.

Verizon also credited the customer for all carrier change charges billed.

Paula Brown, 207-454-0701

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA intraLATA toll service. This carrier change order was executed on that date. Customer complained that this change had not been authorized, and Verizon changed carrier back on 5-22-02.

The customer was billed \$134.91 for interLATA and intraLATA toll services on behalf of USBI for Business Options, and \$103.34 was adjusted and the remaining amount was recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.



Barbara Chase, 207-633-3552

Verizon received electronic carrier change orders on 6-10-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 7-08-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

6-27-02          \$41.86

All toll charges were recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Laura and Norman Crowley, 207-375-8155

On 4-01-02, customer complained that an earlier carrier change had not been authorized, and Verizon changed service to PIC None for interLATA toll service and Verizon for intraLATA toll service.

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 4-29-02.

The customer was billed \$167.78 for interLATA and intraLATA toll services on behalf of USBI for Business Options, of which \$141.25 was credited and the rest was recoured back to the carrier.

Verizon executed carrier change request to change carrier for interLATA toll services to MCI on 6-05-02.

Verizon credited the customer for all carrier change charges billed.

Alice Gallant, 207-967-9870

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 5-14-02.

Customer was billed \$141.85 for interLATA and intraLATA toll services on behalf of USBI for Business Options, which amount was recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Ida and Donald Guptill, 207-698-1850

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 4-27-02.

Customer was billed \$14.03 for interLATA and intraLATA toll services on behalf of USBI for Business Options, which amount was recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Evelyn and Harry Hallowell, 207-764-6146

Verizon received electronic carrier change orders on 6-18-02 and 7-09-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on those dates. Customer complained that these changes had not been authorized, and Verizon changed carrier to MCI on 6-28-02 and to Verizon on 7-15-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

7-3-02	\$19.49
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All charges recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Elizabeth and John Lachance, 207 872-7131

Verizon received electronic carrier change orders on 4-02-02 from Qwest for interLATA toll service (Qwest was existing intraLATA toll provider) and again on 6-10-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on those dates. Customer complained that these changes had not been authorized, and Verizon changed carriers for customer on 6-01-02 and 6-18-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

4-24-02	\$17.86
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5-24-02	10.81
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6-24-02	.81
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All toll charges were recoured to the carrier.

Verizon credited the customer for all carrier change charges billed.

6

Linda Murch, 207-783-1119

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 4-29-02.

The customer was billed \$60.13 for interLATA and intraLATA toll services on behalf of USBI for Business Options, which amount was either credited or recoured to the carrier.

Verizon credited the customer for all carrier change charges billed.

Forrest and Priscilla Ray, 207-848-3838

Verizon received electronic carrier change orders on 4-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 4-19-02.

The customer was billed \$33.90 for interLATA and intraLATA toll services on behalf of USBI for Business Options, which amount was recoured to the carrier.

Verizon credited the customer for all carrier change charges billed.

Robert and Frances Roderick, 207-541-4791

Verizon received electronic carrier change orders on 4-08-02 and 5-22-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on those dates. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 5-13-02 and 6-26-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

4-9-02	\$7.11
5-9-02	10.51
6-9-02	5.72
7-9-02	21.48

All charges were recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Beatrice and Robert Violette, 207-564-2478

Verizon received electronic carrier change orders on 4-22-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 5-14-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

5-3-02           \$34.68

6-3-02           20.30

All charges were recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Virgil and Louise Voter, 207-562-8848

Verizon received electronic carrier change orders on 4-02-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed carriers back on 5-24-02.

The customer was billed \$82.89 for interLATA and intraLATA toll services on behalf of USBI for Business Options, which charges were recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

Leroy Woodman, 207-778-4662

Verizon received electronic carrier change orders on 4-02-02 from Qwest for interLATA and intraLATA toll services and on 4-30-02 for intraLATA toll service. These carrier change orders were executed on those dates. Customer complained that these changes had not been authorized, and Verizon changed interLATA toll carrier back on 4-24-02 and interLATA and intraLATA toll carriers back on 5-17-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

5-9-02           \$28.25

These charges were recoured back to the carrier.

Verizon credited the customer for all carrier change charges billed.

For the following customer listed on Attachment A, Verizon New England did not

receive or execute a carrier change order during the time period specified; however, it did receive and execute carrier change orders as follows:

Russell and Carla Manchester, 207-259-9768

Verizon received electronic carrier change orders on 2-16-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date. Customer complained that these changes had not been authorized, and Verizon changed customer to another carrier on 6-13-02. Verizon subsequently executed change to no presubscribed carriers on 6-28-02.

After these carrier change orders were executed, Verizon billed the following amounts to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options.

2-27-02	7.76
3-27-02	23.89
4-27-02	31.73
5-27-02	30.07
6-27-02	14.88

The customer was given credits for all these charges.

Verizon credited the customer for all carrier change charges billed.

For the following customer listed on Attachment A, Verizon North received and executed carrier change orders, as follows:

Barbara Beeson, 217-932-5584

Verizon received electronic carrier change orders on 3-08-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date

After these carrier change orders were executed, Verizon billed \$22.85 to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options. The customer received credits from the carrier for this amount.

Verizon received electronic carrier change orders on 4-23-02 from Qwest for interLATA and intraLATA toll services. These carrier change orders were executed on that date.

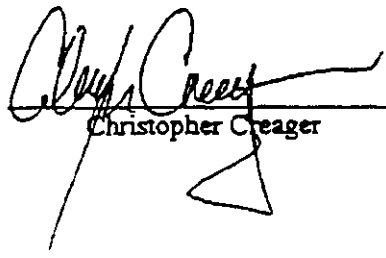
After these carrier change orders were executed, Verizon billed \$47.43 to the customer for interLATA and intraLATA toll services on behalf of USBI for Business Options. The customer received credits from the carrier for \$17.30.

Verizon credited the customer for all carrier change charges billed.

### DECLARATION OF CHRISTOPHER CREAGER

1. My name is Christopher Creager. I am Senior Vice President Customer Operations, National Operations for Verizon
2. Verizon has produced all information that is responsive to the Commission's inquiry that is within Verizon's custody and control.
3. This information is derived from records maintained by Verizon in the ordinary course of its business and was collected under my direction and control, and I believe it to be true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 9, 2002.

  
Christopher Creager